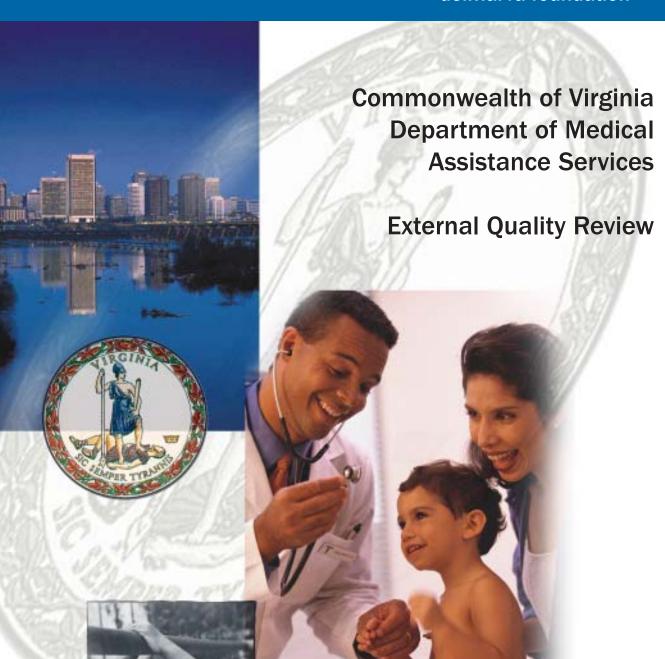
delmarva foundation



Virginia Premier Health Plan SFY 2005



Section II - Performance Improvement Projects

Introduction

As part of the annual External Quality Review (EQR), Delmarva conducted a review of Performance Improvement Projects (PIPs) submitted by each MCO contracting with the Department of Medical Assistance Services (DMAS). According to its contract with DMAS, each MCO is required to conduct PIPs that are designed to achieve, through ongoing measurements and intervention, significant improvement, sustained over time, in clinical care and non-clinical care areas that are expected to have a favorable effect on health outcomes and enrollee satisfaction. According to the contract, the performance improvement projects must include the measurement of performance using objective quality indicators, the implementation of system interventions to achieve improvement in quality, evaluation of the effectiveness of the interventions, and planning and initiation of activities for increasing or sustaining improvement.

The guidelines utilized for PIP review activities were CMS' *Validation of PIPs* protocols. After developing a crosswalk between the QIA form and *Validating PIP Worksheet*, Delmarva staff developed review processes and worksheets using CMS' protocols as guidelines (2002). CMS' *Validation of PIPs* assists EQROs in evaluating whether or not the PIP was designed, conducted, and reported in a sound manner and the degree of confidence a state agency could have in the reported results.

Prior to the PIP review for the 2003 review period (July through December 2003) training on the new validation requirements was provided to the Medallion II MCOs and Delmarva review staff. This training consisted of a four-hour program provided by Delmarva to orient the MCOs to the new BBA requirements and PIP validation protocols so that they would be familiar with the protocols used to evaluate their performance. CMS' validation protocols, *Conducting and Validating Performance Improvement Projects*, were presented to the MCOs in hardcopy during the training.

For the 2003 review period, the reviewers evaluated the entire project submission, although the minimum requirement was that each MCO review and analyze its baseline performance in 2003 to develop strong, self-sustaining interventions targeted to reach meaningful improvement.

For the current review period, calendar year (CY) 2004, the same protocols and tools were used. Reviewers evaluated each project submitted using the CMS validation tools. This included assessing each project across ten steps. These ten steps include:

Step 1: Review the Selected Study Topics

- Step 2: Review the Study Questions
- Step 3: Review the Selected Study Indicator(s)
- Step 4: Review the Identified Study Population
- Step 5: Review Sampling Methods
- Step 6: Review the MCO's Data Collection Procedures
- Step 7: Assess the MCO's Improvement Strategies
- Step 8: Review Data Analysis and Interpretation of Study Results
- Step 9: Assess the Likelihood that Reported Improvement is Real Improvement, and
- Step 10: Assess Whether the MCO has Sustained its Documented Improvement.

As Delmarva staff conducted the review, each component within a standard (step) was rated as "yes," "no," or "N/A" (not applicable). Components were then rolled up to create a determination of "met", "partially met", "unmet" or "not applicable" for each of the ten standards. Table 1 describes this scoring methodology.

Table 1. Rating Scale for Performance Improvement Project Validation Review

Rating	Rating Methodology
Met	All required components were present.
Partially Met	One but not all components were present.
Unmet	None of the required components were present.
Not Applicable	None of the required components are applicable.

Results

This section presents an overview of the findings of the Validation Review conducted for each PIP submitted by the MCO. Each MCO's PIP was reviewed against all 27 components contained within the ten standards.

VA Premier provided the ten activities assessed for each PIP are presented in Table 2 below.

Table 2. 2004 Performance Improvement Project Review for VA Premier

		Review Det	ermination
Activity Number	Activity Description	Monitoring and Controlling the Management with the use of Two or More Atypical Antipsychotics	Quality Control in Asthma Management
1	Assess the Study Methodology	Partially Met	Met
2	Review the Study Question(s)	Unmet	Met
3	Review the Selected Study Indicator(s)	Unmet	Met
4	Review the Identified Study Population	Unmet	Met
5	Review Sampling Methods	Met	Met
6	Review Data Collection Procedures	Partially Met	Partially Met
7	Assess Improvement Strategies	Met	Partially Met
8	Review Data Analysis and Interpretation of Study Results	Met	Partially Met
9	Assess Whether Improvement is Real Improvement	Met	Partially Met
10	Assess Sustained Improvement	Met	Partially Met

Conclusions and Recommendations

Conclusions

VA Premier Health Plan (VA PREMIER) provided two PIPs for review. These included, (1) Monitoring and Controlling the Management with the Use of Two or More Atypical Antipsychotics, and (2) Quality Control in Asthma Management. These were evaluated using the Validating Performance Improvement Projects protocol, commissioned by the Department of Health and Human Services, Centers for Medicare and Medicaid Services, which allows assessment among 10 different project activities.

For the Atypical Antipsychotic Project, the MCO received a review determination of "Met" for five (5) elements, "Partially Met" for two (2) elements and Unmet for three (3) elements. For the Asthma Project, the MCO received a review determination of "Met" for five (5) elements and "Partially Met" for five (5) elements. None of the elements were "Unmet" for this project.

Recommendations

Based on a review of each of the two PIPs provided by the MCO, the following recommendations are made to improve the PIP process and performance.

- ➤ Improving provider compliance with clinical practice guidelines is not an appropriate study topic for a PIP (Monitoring and Controlling the Management with the Use of Two or More Atypical Antipsychotics project). A PIP should address system-wide issues, (enrollee, provider, and administrative) that present potential barriers to improved enrollee health outcomes.
- > Describe a clear problem statement based upon analysis of data, which includes the actual or potential health consequences to the Medallion II population.
- Indicators need to be objective, clearly defined measures. Consider limiting the number of indicators and utilizing analysis of findings to drill down to additional detail and barriers relating to performance gaps. Cite references in clinical literature supporting association between improvements in selected indicators and changes in health status or valid proxy measures.
- Clearly define the identified study population to include age and enrollment requirements. Describe how VA PREMIER ensures that the data collection approach validly captures all Medicaid enrollees for each of the indicators.
- Clearly specify the data to be collected. Include a description of the data collection process, automated or manual. If automated, the degree of data completeness should be estimated. Provide evidence of an internal plan to ensure the collection of valid and reliable data for each indicator. If manual data collection is performed for any indicator, describe how the data collection instrument was designed to promote inter-rater reliability. Describe a prospective data analysis plan for each indicator. Qualifications of staff/personnel used to collect the data should be specified for all indicators.
- Ensure that a barrier analysis is completed after each measurement for all indicators.
- Consider analyzing data after each measurement period.
- The PIP report should include a description of the internal plan to ensure the collection of valid and reliable data for each indicator. Describe the degree of completeness of the automated data used for each study indicator. Identify how pharmacy data is to be collected. If manual data collection is performed for any indicator, describe how the data collection instrument was designed to promote inter-rater reliability. Describe a prospective data analysis plan for each indicator. Qualifications of staff/personnel used to collect the data should be specified for all indicators.
- Perform a barrier analysis for each indicator after each measurement period. Identify appropriate interventions for each indicator based upon identified opportunities for improvement.
- Perform a quantitative and qualitative analysis for each indicator after each remeasurement and ensure that the time period is clearly specified. For qualitative analysis identify barriers, opportunities, and interventions for each indicator. Avoid changes in methodology that impact comparability of results from one measurement period to another.

- Avoid changes in methodology that impact comparability of results from one measurement period to another. For the intervention to have face validity the analysis should describe how specific interventions contributed to the demonstrated success of each indicator.
- Strong, timely, and targeted interventions directly linked to identified barriers and opportunities for improvement should assist VA PREMIER in demonstrating sustained improvement through repeat measurements.

QUALITY IMPROVEMENT PROJECT VALIDATION WORKSHEET

Use this or a similar worksheet as a guide when validating MCO/PHP Quality Improvement Projects. Answer all questions for each activity. Refer to the protocol for detailed information on each area.

ID of evaluator <u>jaa</u> Date of evaluation: <u>July 2005</u>

Demographic Infor	mation						
MCO/PHP Name or ID:	VA Premier Health Plan						
Project Leader Name:	der Name: Jamie McPherson, Director, Quality Improvement						
Telephone Number:	(804) 819-5179 Email: jmcpherson@vapremier.com						
Name of Quality Improvement Project: Quality Control in Asthma Management							
Dates in Study Period:	January 1, 2002 to December 31, 2004 Phase: Remeasurement 2						

ACTIVITY 1: ASSESS THE STUDY METHODOLOGY Step 1. REVIEW THE SELECTED STUDY TOPIC (S) Υ Component/Standard Ν N/A Comments Cites and Similar References QAPI RE2Q1 1.1 Was the topic selected through data \boxtimes \Box VA Premier Health Plan (VA PREMIER) has analyzed national and plan specific data in selecting its study **QAPI RE2Q2, 3,4** collection and analysis of comprehensive aspects of enrollee topic. Nationally asthma ranks as the sixth most QIA S1A1 needs, care and services? common chronic condition and contributes to premature death if uncontrolled, lost work/school days, and use of high intensity medical services. Analysis of VA PREMIER MY 2003 data ranked asthma in the top five percent of diagnoses for all hospital admissions/emergency department visits for the Medallion II population. \bowtie QAPI RE2Q1 1.2 Did the MCO/PHP QIP address a broad This PIP seeks to decrease emergency department П OIA S1A2 spectrum of key aspects of enrollee visits and hospital admissions for Medallion II care and services? enrollees who have been diagnosed with asthma. The PIP also includes a goal to increase the use of appropriate asthma medications. This PIP, over time, did address multiple care and delivery systems that have the ability to pose barriers to improved enrollee outcomes and meets the requirements of this element.

I. ACTIVITY 1: ASSESS THE STUDY METHODOLOGY						
Step 1. REVIEW THE SELECTED ST	TUDY TO	PIC (S)				
1.3 Did the MCO/PHP QIP include all	\boxtimes			This clinical PIP addresses care of all Medicaid HMO	QAPI RE2Q1	
enrolled populations; i.e., did not				enrollees age 5-56 by December 31 of the	QIA S1A2	
exclude certain enrollees such as with				measurement year who are identified as having		
those with special health care needs?				persistent asthma. For all three indicators VA		
				PREMIER followed the HEDIS eligible population		
				description for Medicaid that contains inclusion and		
				exclusion criteria.		
Assessment Component 1						
	resent.					
Partially Met - Some, but not all com	ponents	are prese	nt.			
Unmet -None of the required components is present.						
Recommendations						

Step 2: REVIEW THE STUDY QUESTION (S)							
Component/Standard	Y	N	N/A	Comments	Cites and Similar		
					References		
2.1 Was there a clear problem statement	\boxtimes			VA PREMIER presented a clear problem statement	QIA S1A3		
that described the rationale for the				that described why this study was meaningful to the			
study?				Medallion II population. According to VA PREMIER			
				enrollees do not effectively manage their asthma			
				condition with controller medications as evidenced			
				by acute care utilization (hospital admissions and			
				emergency department visits), which leads to poor			
				health status and an increase in health care costs.			
				Supporting data from the 2003 NCQA State of			
				Health Care Quality Report was cited including a			
				45% reduction in the risk of repeat emergency			
				department visits in patients using controller			
				medications as compared with nonusers.			
Assessment Component 2							
	resent.						
Partially Met - Some, but not all com	ponents	are prese	nt.				
Unmet -None of the required components is present.							
Recommendations							

Step 3: REVIEW SELECTED STUDY INDICATOR (S)							
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
3.1 Did the study use objective, clearly	\boxtimes			Three indicators were identified for this study: one or	QAPI RE3Q1,		
defined, measurable indicators?				more prescriptions for inhaled corticosteroids,	QAPI RE3Q2-6		
				nedocromil, cromolyn sodium, leukotriene modifiers	QAPI RE3Q7-8		
				or methylxanthines (appropriate asthma medication)	QIA S1B2		
				for enrollee with persistent asthma, rate of hospital	QIA S1B3		
				admissions for enrollees with persistent asthma, and			
				rate of emergency department visits for enrollees			
				with persistent asthma. All indicators were			
				objective, clearly and unambiguously defined, and			
				based on current clinical knowledge. HEDIS			
				methodology was utilized for identifying enrollees			
				with persistent asthma.			
3.2 Did the indicators measure changes in	\boxtimes			Decreased inpatient admissions and emergency	QAPI RE3Q9		
health status, functional status, or				department visits as well as use of appropriate	QIA S1B1		
enrollee satisfaction, or processes of				asthma medications have been identified as valid			
care with strong associations with				proxy measures for improved health status.			
improved outcomes?							
Assessment Component 3							
	resent.						
Partially Met - Some, but not all components are present.							
Unmet -None of the required components are present.							
Recommendations		_					

Step 4: REVIEW THE IDENTIFIED STUDY POPULATION							
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
4.1 Did the MCO/PHP clearly define all				VA PREMIER clearly defined all Medicaid enrollees	QAPI RE2Q1,		
Medicaid enrollees to whom the study				for each of the three indicators based upon HEDIS	QAPI RE3Q2-6		
question(s) and indicator(s) are				specifications. The eligible population included			
relevant?				individuals 5-56 years of age by December 31 of the			
				measurement year who were identified as having			
				persistent asthma based upon meeting one of four			
				criterion in the prior year.			
4.2 If the MCO/PHP studied the entire	\boxtimes			HEDIS specifications and methodology meet the	QAPI RE4Q1&2		
population, did its data collection				requirements of this component for all indicators.	QAPI RE5Q1.2		
approach capture all enrollees to					QIA I B, C		
whom the study question applied?							
Assessment Component 4							
	resent.						
Partially Met - One, but not all components are present.							
Unmet -None of the required components is present.							
Recommendations							

Step 5: REVIEW SAMPLING METHODS							
Component/Standard	Y	N	N/A	Comments	Cites and Similar		
					References		
5.1 Did the sampling technique consider			\boxtimes	No sampling was used. VA PREMIER included the	QAPI RE5Q1.3a		
and specify the true (or estimated)				entire eligible population in the PIP.	QIA S1C2		
frequency of occurrence of the event,							
the confidence interval to be used, and							
the margin of error that will be							
acceptable?							
5.2 Did the MCO/PHP employ valid			\boxtimes	No sampling was used. VA PREMIER included the	QAPI RE5Q1.3b-c		
sampling techniques that protected				entire eligible population in the PIP.	QIA S1C2		
against bias?							
Specify the type of sampling or census							
used:							
5.3 Did the sample contain a sufficient			\boxtimes	No sampling was used. VA PREMIER included the	QAPI RE5Q1.3b-c		
number of enrollees?				entire eligible population in the PIP.	QIA S1C2		
Assessment Component 5							
	resent.						
Partially Met – Some, but not all components are present.							
Unmet -None of the required components is present.							
Recommendations							

Step 6: REVIEW DATA COLLECTIO	Step 6: REVIEW DATA COLLECTION PROCEDURES							
Component/Standard	Y	N	N/A	Comments	Cites and Similar			
					References			
6.1 Did the study design clearly specify the				The "Baseline Methodology" section specified the	QAPI RE4Q1&2			
data to be collected?				data to be collected for the numerator and the				
				denominator for each indicator. For all three				
				indicators HEDIS methodology was utilized for				
				identifying the eligible population (denominator). For				
				the numerator for indicator #1 VA PREMIER used the				
				NDC list provided by NCQA to identify appropriate				
				prescriptions. For the numerator for indicators #2				
				and #3 diagnostic codes for asthma were identified				
				as well as utilization data (emergency department				
				visits, inpatient hospital admissions).				
6.2 Did the study design clearly specify the	\boxtimes			Sources of data were clearly identified for each	QAPI RE4Q1&2			
sources of data				indicator to include claims/encounter data and				
				pharmacy data.				
6.3 Did the study design specify a		\boxtimes		The data collection methodology for all three	QAPI RE4Q3a			
systematic method of collecting valid				indicators was listed as a programmed pull from	QAPI RE4Q3b			
and reliable data that represents the				claims/encounter files of all eligible members as	QIA S1C1			
entire population to which the study's				well as pharmacy data. There was no indication of	QIA S1C3			
indicator(s) apply?				the degree of completeness of automated data. It is				
				unclear whether pharmacy data will be collected				
				manually or through an automated system. Data				
				collection was identified as once a year. There was				
				no evidence of a plan to audit data to ensure validity				
				and reliability for any of the three indicators for MY				
				2004 data.				

Step 6: REVIEW DATA COLLECTION PROCEDURES							
6.4 Did the instruments for	data collection		\boxtimes		There was no evidence to support clear data	QAPI RE4Q1&2	
provide for consistent,	accurate data				collection instruments designed to promote inter-	QAPI RE4Q3b	
collection over the time	e periods				rater reliability for any manual data collection.	QAPI RE7Q1&2	
studied?							
6.5 Did the study design pr	ospectively		\boxtimes		A prospective data analysis plan was not fully	QAPI RE5Q1.2	
specify a data analysis	plan?				described, other than to state the frequency of the		
					data analysis cycle.		
6.6 Were qualified staff and	d personnel		\boxtimes		The PIP did not specify the qualifications of staff and	QAPI RE4Q4	
used to collect the data	a?				personnel used to collect the data for any of the		
					three indicators.		
Assessment Component 6							
Met – All required	components are p	resent.					
Partially Met – Some, but not all components are present.							
Unmet -None of the required components is present.							
Recommendations							
The PIP report should include a description of the internal plan to ensure the collection of valid and reliable data for each indicator. Describe the							

The PIP report should include a description of the internal plan to ensure the collection of valid and reliable data for each indicator. Describe the degree of completeness of the automated data used for each study indicator. Identify how pharmacy data is to be collected. If manual data collection is performed for any indicator, describe how the data collection instrument was designed to promote inter-rater reliability. Describe a prospective data analysis plan for each indicator. Qualifications of staff/personnel used to collect the data should be specified for all indicators.

Step 7: ASSESS IMPROVEMENT STRATEGIES							
Component/Standard	Y	N	N/A	Comments	Cites and Similar		
					References		
7.1 Were reasonable interventions		\boxtimes		There is evidence that VA PREMIER performed a	QAPI RE6Q1a		
undertaken to address causes/barriers				limited barrier analysis but it is unclear what	QAPI RE6Q1b		
identified through data analysis and QI				measurement period the barrier analysis addresses.	QAPI RE1SQ1-3		
processes undertaken?				Interventions related to the asthma medication	QIA \$3.5		
				indicator appeared appropriate based upon the	QIA S4.1		
				administrative, provider, and enrollee barriers	QIA S4.2		
				identified. There was no barrier analysis for the	QIA \$4.3		
				hospital admission or emergency department			
				indicators. Rather VA PREMIER stated in PIP			
				documentation that if enrollees were compliant with			
				controller medications as measured by indicator #1			
				there would be improvements in these indicators as			
				well. While clearly appropriate use of controller			
				medications has the potential to reduce hospital			
				admissions and emergency department visits there			
				may be other factors contributing to this utilization,			
				which should be analyzed. For instance, enrollees			
				often utilize the emergency room for routine health			
				care needs for convenience since they can receive			
				same day care.			
Assessment Component 7							
☐ Met – All required components are p	resent.						
Partially Met – Some, but not all com	ponents	are prese	nt.				
Unmet -None of the required compor	nents is pi	resent.					

Step 7: ASSESS IMPROVEMENT STRATEGIES

Recommendations

Perform a barrier analysis for each indicator after each measurement period. Identify appropriate interventions for each indicator based upon identified opportunities for improvement.

Step 8: REVIEW DATA ANALYSIS AND INTERPRETATION OF STUDY RESULTS							
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
8.1 Was an analysis of the findings		\boxtimes		A quantitative analysis of each indicator was	QAPI RE4Q4		
performed according to the data				performed following receipt of remeasurement 2	QIA III		
analysis plan?				results. There was evidence of a qualitative analysis			
				for the asthma medication indicator; however, it is			
				unclear what measurement period this analysis			
				addresses. There was no evidence of a qualitative			
				analysis for indicators #2 and #3.			
8.2 Did the MCO/PHP present numerical	\boxtimes			The Data/Results Table accurately and clearly			
QIP results and findings accurately and				identified the rate, MCO goal, and benchmark for			
clearly?				each indicator for each measurement period.			
8.3 Did the analysis identify: initial and	\boxtimes			The analysis of results for the three indicators	QAPI RE7Q2		
repeat measurements, statistical				compared the second remeasurement to baseline	QIA S1C4		
significance, factors that influence				and remeasurement 1. There was no analysis of	QIA S2.1		
comparability of initial and repeat				remeasurement 2 with the comparison goal or			
measurements, and factors that				benchmark. The PIP reported that remeasurement 2			
threaten internal and external validity?				results were not comparable to previous year's data			
				due to a change in the requirement for continuous			
				enrollment. This change also appears to impact			
				comparability of results from remeasurement to 1 to			
				baseline as well. A test of statistical significance			
				was conducted for each indicator.			

Step 8: REVIEW DATA ANALYSIS AND INTERPRETATION OF STUDY RESULTS						
8.4 Did the analysis of study data include		\boxtimes		The analysis included an assessment of the success	QIA S2.2	
an interpretation of the extent to which				of each indicator relative to past performance. A		
its QIP was successful and follow-up				graph was included to illustrate the three year PIP		
activities?	ļ			trend for each indicator. The qualitative analysis		
				section addressed opportunities and interventions		
				for barriers identified for the appropriate asthma		
	ļ			medication indicator. There was no barrier analysis		
	ļ			for the other two indicators or related follow up		
				activities identified.		
Assessment Component 8						
	resent.					
Partially Met – Some, but not all com	nponents	are prese	nt.			
Unmet -None of the required components is present.						
Recommendations						
Perform a quantitative and qualitative analys	is for eac	h indicato	r after ea	ch remeasurement and ensure that the time period is c	learly specified. For	
qualitative analysis identify barriers, opportu	nities, and	d intervent	ions for e	each indicator.		

Step 9: ASSESS WHETHER IMPROVEMENT IS REAL IMPROVEMENT							
Component/Standard	Y	N	N/A Comments	Comments	Cites and Similar		
					References		
9.1 Was the same methodology as the		\boxtimes		The same methodology was not used according to	QAPI RE7Q2		
baseline measurement used when				PIP documentation. It appears that for	QAPI 2SQ1-2		
measurement was repeated?				remeasurement 2 for indicators #2 and #3 VA	QIA S1C4		
				PREMIER no longer utilizes a continuous enrollment	QIA S2.2		
				requirement for determining the eligible population.	QIA \$3.1		
				This precludes comparison of remeasurement 2	QIA S3.3		
				results with baseline and remeasurement 1 rates for	QIA S3.4		
				both of these indicators. While there was no change			
				noted for indicator #1 the denominator for all three			
				measurement periods is identical to indicators #2			
				and #3 suggesting a change in enrollment eligibility			
				criteria for this indicator as well.			

Step 9: ASSESS WHETHER IMPROVEMENT IS REAL IMPROVEMENT						
9.2 Was there any documented	\boxtimes			Improvement from baseline to remeasurement 2	QAPI RE7Q3	
quantitative improvement in processes				was evident for all three indicators. For use of	QIA \$2.3	
or outcomes of care?				appropriate asthma medications the rate increased		
				from 62.0% to 70.6%. For the inpatient hospital		
				admissions indicator the rate decreased from 20.8		
				to 6.4. For emergency department visits the rate		
				decreased from 66.0 to 32.4. Improvement was		
				also evident in all three indicators from		
				remeasurement 1 to remeasurement 2. For the		
				appropriate medication indicator the rate increased		
				from 61.9 to 70.6. For the hospital admission		
				indicator the rate decreased from 20.2 to 6.4. For		
				the emergency department visit indicator the rate		
				decreased from 78.9 to 32.4. These improvements		
				in indicator rates, however, need to be carefully		
				considered in light of the change in enrollment		
				eligibility criteria for remeasurement 2.		

Step 9: ASSESS WHETHER IMPROVEMENT IS REAL IMPROVEMENT							
9.3 Does the reported improvement in		\boxtimes		All indicators demonstrated statistically significant	QIA \$3.2		
performance have face validity; i.e.,				improvement from remeasurement 1 to			
does the improvement in performance				remeasurement 2. Face validity for the reported			
appear to be the result of the planned				improvements cannot be established, however, since			
quality improvement intervention?				many of the interventions implemented in 2004			
				(remeasurement 2) did not occur until mid-year. For			
				example, PCPs did not begin receiving a quarterly			
				listing of enrollees who were currently receiving			
				prescriptions for asthma without long-acting beta			
				antagonist inhalers as well as enrollees who had			
				been hospitalized or seen in the emergency			
				department for an asthma diagnosis until May 2004.			
				Primarily educational interventions directed at			
				enrollees in 2003 may be responsible for some of			
				the decrease but it is unlikely that education alone			
				could have had such an impact.			
9.4 Is there any statistical evidence that	\boxtimes			Using a Chi-square test there was a statistically	QIA S2.3		
any observed performance				significant increase in the appropriate asthma			
improvement is true improvement?				medication indicator for remeasurement 2 in			
				comparison to both baseline and remeasurement 1.			
				For both the hospital admission and emergency			
				department visit indicators there was a statistically			
				significant decrease for remeasurement 2 compared			
				to baseline and remeasurement 1.			

Step 9:	ASSESS WHETHER IMPROVEMENT IS REAL IMPROVEMENT
Assessr	ment Component 9
	Met – All required components are present.
	Partially Met – Some, but not all components are present.
	Unmet -None of the required components is present.
Recom	mendations
Avoid ch	hanges in methodology that impact comparability of results from one measurement period to another. For the intervention to have face
validity	the analysis should describe how specific interventions contributed to the demonstrated success of each indicator.

Step 10: ASSESS SUSTAINED IMPROVEMENT							
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
10.1 Was sustained improvement		\boxtimes		There was evidence to support sustained	QAPI RE2SQ3		
demonstrated through repeated				improvement for the appropriate asthma medication	QIA II, III		
measurements over comparable time				and hospital admission indicators. The emergency			
periods?				department visit indicator demonstrated an increase			
				of 12.9 percentage points from baseline to			
				remeasurement 1. As noted above, however, valid			
				comparisons between remeasurement 2 and prior			
				measurements are limited as a result of the change			
				in enrollment eligibility requirements for the most			
				recent period.			
Assessment Component 10							
	resent.						
Partially Met – Some, but not all com	ponents	are prese	nt.				
Unmet -None of the required compor	nents is pi	resent.					
Recommendations							
Strong, timely, and targeted interventions dire	ectly linke	ed to iden	tified barr	iers and opportunities for improvement should assist VA	PREMIER in		
demonstrating sustained improvement throu	gh repeat	measure	ments.				

	Key Findings for: Proposal Annual Resubmission Final
1.	Strengths
	 VA PREMIER researched and adopted well-established benchmarks from organizations including the National Committee for Quality Assurance and the Centers for Disease Control. One benchmark was obtained from Healthy People 2010. The study indicators were objective and well defined. A clear problem statement identified the importance of this study for the Medallion II population. HEDIS specifications were utilized to identify the eligible population. There was evidence of statistically significant improvement for all three indicators from baseline and remeasurement 1 to remeasurement 2.
2.	
	VA PREMIER identified PCPs with a high volume of enrollees with asthma and partnered with the PCP to place peak flow meters and spacers in their office to educate enrollees on proper use in real time and dispense as needed.
3.	Potential /significant issues experienced by MCO (Barrier Analysis/Clarification Questions)
	Barriers identified included: Providers are not able to identify enrollees who need assistance in managing their asthma more effectively. Enrollees lack information regarding the asthma management program. Lack of continuous asthma education for enrollees. Lack of application of Plan guidelines related to asthma management.
	➤ Lack of enrollees getting flu shots.

	Key Fi	ndings for: Proposal Annual Resubmission Final
4.	Actions	taken by MCO (Barrier Analysis/Response to Clarification Questions)
	Actions	taken by the MCO included:
	>	PCPs receive a quarterly listing of enrollees with emergency department visits, inpatient hospital admissions, or who need
		appropriate asthma medication.
	>	All newly identified enrollees with a diagnosis of asthma will be sent a letter informing them of the asthma management program
		and contact information.
	>	Quarterly communications will be included in the provider newsletter on new formulary and asthma management strategies and
		resources. Educational information for enrollees will be included in the quarterly enrollee newsletter.
	>	VA PREMIER will partner with community-based agencies, hospitals, PHOs, and providers to present an annual training on Plan
		guideline related to asthma management.
	>	Enrollees with persistent asthma will be sent reminders to receive an annual flu shot.

	Key Findings for: Proposal Annual Resubmission Final
5.	Recommendations for the next submission (Pull from each Step Recommendations)
	> The PIP report should include a description of the internal plan to ensure the collection of valid and reliable data for each indicator. Describe the degree of completeness of the automated data used for each study indicator. Identify how pharmacy data is to be collected. If manual data collection is performed for any indicator, describe how the data collection instrument was designed to promote inter-rater reliability. Describe a prospective data analysis plan for each indicator. Qualifications of staff/personnel used to collect the data should be specified for all indicators.
	> Perform a barrier analysis for each indicator after each measurement period. Identify appropriate interventions for each indicator based upon identified opportunities for improvement.
	 Perform a quantitative and qualitative analysis for each indicator after each remeasurement and ensure that the time period is clearly specified. For qualitative analysis identify barriers, opportunities, and interventions for each indicator. Avoid changes in methodology that impact comparability of results from one measurement period to another. Avoid changes in methodology that impact comparability of results from one measurement period to another. For the intervention to have focus validity the applying should describe have energific interventions contributed to the demonstrated queeess of each.
	to have face validity the analysis should describe how specific interventions contributed to the demonstrated success of each indicator. Strong, timely, and targeted interventions directly linked to identified barriers and opportunities for improvement should assist VA PREMIER in demonstrating sustained improvement through repeat measurements.
	The study design and methodology for this PIP submission meets PIP requirements. The EQRO recommends that the MCO continue with the project and report next year in the Spring of 2006 (exact time to be determined).
	The study design and methodology for this PIP submission does not meet PIP requirements. To meet requirements, we recommend the MCO resubmit the following by (date): • (Action) • (Action)

QUALITY IMPROVEMENT PROJECT VALIDATION WORKSHEET

Use this or a similar worksheet as a guide when validating MCO/PHP Quality Improvement Projects. Answer all questions for each activity. Refer to the protocol for detailed information on each area.

ID of evaluator <u>jaa</u> Date of evaluation: <u>July 2005</u>

Demographic Infor	mation	
MCO/PHP Name or ID:	VA Premier Heal	lth Plan
Project Leader Name:	Jamie McPherso	on, Director, Quality Improvement
Telephone Number:	(804) 819-5179	Email: jmcpherson@vapremier.com
Name of Quality Improv More Atypical Antipsych	•	Monitoring and Controlling the Management with the Use of Two or
Dates in Study Period:	July 1, 2004 to J	June 30, 2005 Phase: Remeasurement 1
Note: VA Premier subm	itted data for rem	neasurement I from January 1 to June 30, 2005 which is outside of
this review period. It w	ill be reviewed in 2	2006.

ACTIVITY 1: ASSESS THE STUDY METHODOLOGY Step 1. REVIEW THE SELECTED STUDY TOPIC (S) Υ Component/Standard Ν N/A **Comments Cites and Similar** References \bowtie \Box QAPI RE2Q1 1.1 Was the topic selected through data VA Premier Health Plan (VA PREMIER) analyzed their **QAPI RE2Q2, 3,4** collection and analysis of Medallion II data in response to a recent finding comprehensive aspects of enrollee nationally that has linked the development of QIA S1A1 needs, care and services? diabetes and other metabolic abnormalities with prescribed atypical antipsychotics. Review of Medallion II data for MY 2004 revealed that 11.5% and 14.1% of enrollees were receiving treatment with two or more atypical antipsychotics from their physicians and psychiatrists respectively. Additionally, 13.6% and 23.7% of physicians and psychiatrists respectively prescribed treatment to enrollees of two or more atypical antipsychotics. While it is evident that VA PREMIER analyzed

		,	
		provider compliance with clinical practice guidelines.	
1.2 Did the MCO/PHP QIP address a broad		This PIP seeks to decrease the number of providers	QAPI RE2Q1
spectrum of key aspects of enrollee		prescribing two or more atypical antipsychotics. As	QIA S1A2
care and services?		noted above improving provider compliance with	
		clinical practice guidelines is not an appropriate	
		study topic for a PIP. A PIP should address system-	
		wide issues, (enrollee, provider, and administrative)	
		that present potential barriers to improved enrollee	

Medallion II data to select this study topic a PIP should focus on system-wide issues rather than

health outcomes.

I. ACTIVITY 1: ASSESS THE STUDY METHODOLOGY								
Step 1. REVIEW THE SELECTED STUDY TOPIC (S)								
1.3 Did the MCO/PHP QIP include all	\boxtimes			This PIP addressed all enrollees prescribed atypical	QAPI RE2Q1			
enrolled populations; i.e., did not				antipsychotics from a physician, psychiatrist or non-	QIA S1A2			
exclude certain enrollees such as with				psychiatrist. There was no evidence that certain				
those with special health care needs?				enrollees were excluded.				
Assessment Component 1								
☐ Met – All required components are present.								
Unmet -None of the required components is present.								
Recommendations								
Improving provider compliance with clinical practice guidelines is not an appropriate study topic for a PIP. A PIP should address system-wide issues,								
(enrollee, provider, and administrative) that p	(enrollee, provider, and administrative) that present potential barriers to improved enrollee health outcomes.							

Step 2: REVIEW THE STUDY QUES	TION (S)						
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
2.1 Was there a clear problem statement		\boxtimes		There was no clear problem statement. The problem	QIA S1A3		
that described the rationale for the				was stated as an increasing number of providers			
study?				using two or more atypical antipsychotic medications			
				for the same enrollee. There was no evidence to			
				support increasing numbers. The problem statement			
				did not include the actual or potential health			
				consequences to the Medallion II population.			
Assessment Component 2							
	resent.						
Partially Met – Some, but not all com	ponents	are prese	nt.				
Recommendations							
Describe a clear problem statement based upon analysis of data, which includes the actual or potential health consequences to the Medallion II							
population.							

Step 3: REVIEW SELECTED STUDY	/ INDICA	TOR (S)			
Component/Standard	Υ	N	N/A	Comments	Cites and Similar
					References
3.1 Did the study use objective, clearly		\boxtimes		Six indicators were identified for this PIP. Three	QAPI RE3Q1,
defined, measurable indicators?				indicators addressed the percentage of enrollees	QAPI RE3Q2-6
				receiving treatment with two or more atypical	QAPI RE3Q7-8
				antipsychotics prescribed by a physician (indicator	QIA S1B2
				#1), prescribed by a psychiatrist (indicator #2) and	QIA S1B3
				prescribed by a non-psychiatrist (indicator #3).	
				Differentiation among provider types is unclear. For	
				example, what is the difference between a physician	
				and a psychiatrist since psychiatrists are physicians?	
				The remaining three indicators address the	
				percentage of physicians (indicator #4), psychiatrists	
				(indicator #5), and non-psychiatrists (indicator #6)	
				prescribing two or more atypical antipsychotics in the	
				measurement year. These indicators present the	
				same problem noted above in differentiating by	
				provider type. Additionally, there were no criteria	
				specified for defining age, enrollment, or atypical	
				antipsychotic requirements for any of the indicators.	
				While there are not only problems in defining the	
				indicators the number of indicators are unnecessary.	
				One indicator would be sufficient with analysis of	
				findings isolating, for example, provider types.	

Step 3: REVIEW SELECTED STUDY INDICATOR (S)						
3.2 Did the indicators measure changes in		\boxtimes		While the PIP described a recent association	QAPI RE3Q9	
health status, functional status, or				between the development of diabetes and other	QIA S1B1	
enrollee satisfaction, or processes of				metabolic abnormalities with atypical antipsychotics		
care with strong associations with				there was no evidence cited from clinical literature to		
improved outcomes?				support the improvement in selected indicators with		
				improved health status.		
Assessment Component 3						
	resent.					
Partially Met – Some, but not all com	ponents	are prese	nt.			
Unmet -None of the required components are present.						
Recommendations						
Indicators need to be objective, clearly defined measures. Consider limiting the number of indicators and utilizing analysis of findings to drill down to						
surface additional detail and barriers relating to performance gaps. Cite references in clinical literature supporting association between						
improvements in selected indicators and changes in health status or valid proxy measures.						

Step 4: REVIEW THE IDENTIFIED STUDY POPULATION							
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
4.1 Did the MCO/PHP clearly define all		\boxtimes		VA PREMIER defined the identified study population	QAPI RE2Q1,		
Medicaid enrollees to whom the study				as all enrollees receiving two or more atypical	QAPI RE3Q2-6		
question(s) and indicator(s) are				antipsychotics prescribed by a physician, psychiatrist,			
relevant?				or non-psychiatrist in the measurement year. Age			
				and enrollment criteria were not specified which is a			
				component of a clearly defined study population.			
4.2 If the MCO/PHP studied the entire		\boxtimes		There was no information provided to support the	QAPI RE4Q1&2		
population, did its data collection				existence of procedures to ensure that VA PREMIER's	QAPI RE5Q1.2		
approach capture all enrollees to				data collection approach captured all Medicaid	QIA I B, C		
whom the study question applied?				enrollees for any of the indicators.			
Assessment Component 4							
	resent.						
Partially Met - One, but not all comp	onents ar	e present					
☐ Unmet -None of the required components is present.							
Recommendations							
Clearly define the identified study population to include age and enrollment requirements. Describe how VA PREMIER ensures that the data							
collection approach validly captures all Medic	aid enroll	lees for ea	ach of the	indicators.			

Step 5: REVIEW SAMPLING METH	IODS						
Component/Standard	Y	N	N/A	Comments	Cites and Similar		
					References		
5.1 Did the sampling technique consider			\boxtimes	No sampling was used. VA PREMIER included the	QAPI RE5Q1.3a		
and specify the true (or estimated)				entire eligible population in the PIP.	QIA S1C2		
frequency of occurrence of the event,							
the confidence interval to be used, and							
the margin of error that will be							
acceptable?							
5.2 Did the MCO/PHP employ valid			\boxtimes	No sampling was used. VA PREMIER included the	QAPI RE5Q1.3b-c		
sampling techniques that protected				entire eligible population in the PIP.	QIA S1C2		
against bias?							
Specify the type of sampling or census							
used:							
5.3 Did the sample contain a sufficient			\boxtimes	No sampling was used. VA PREMIER included the	QAPI RE5Q1.3b-c		
number of enrollees?				entire eligible population in the PIP.	QIA S1C2		
Assessment Component 5							
	resent.						
Partially Met - Some, but not all con	nponents	are prese	nt.				
Unmet -None of the required components is present.							
Recommendations	Recommendations						

Step 6: REVIEW DATA COLLECTION PROCEDURES									
Component/Standard	Υ	N	N/A	Comments	Cites and Similar				
					References				
6.1 Did the study design clearly specify the		\boxtimes		Data to be collected was not clearly specified based	QAPI RE4Q1&2				
data to be collected?				upon poorly defined, ambiguous indicators.					
6.2 Did the study design clearly specify the	\boxtimes			Pharmacy data was identified as the source of data	QAPI RE4Q1&2				
sources of data				for all indicators.					
6.3 Did the study design specify a		\boxtimes		The data collection methodology was identified as	QAPI RE4Q3a				
systematic method of collecting valid				pharmacy data with no indication of whether this	QAPI RE4Q3b				
and reliable data that represents the				data will be collected manually or through an	QIA S1C1				
entire population to which the study's				automated system. If the data collection is	QIA S1C3				
indicator(s) apply?				automated the PIP should identify the degree of data					
				completeness. Data collection was identified as					
				twice a year. There was no evidence of a plan to					
				audit data to ensure validity and reliability for any of					
				the indicators for MY 2004 data.					
6.4 Did the instruments for data collection		\boxtimes		There was no evidence to support clear data	QAPI RE4Q1&2				
provide for consistent, accurate data				collection instruments designed to promote inter-	QAPI RE4Q3b				
collection over the time periods				rater reliability for any manual data collection.	QAPI RE7Q1&2				
studied?									
6.5 Did the study design prospectively		\boxtimes		There was no evidence of a prospective data analysis	QAPI RE5Q1.2				
specify a data analysis plan?				plan. The data analysis cycle was identified as once					
				a year.					
6.6 Were qualified staff and personnel		\boxtimes		Qualifications of staff used to collect the data were	QAPI RE4Q4				
used to collect the data?				not specified.					
Assessment Component 6									
☐ Met – All required components are present.									
Partially Met – Some, but not all com	ponents	are prese	nt.						
Unmet -None of the required components is present.									

Step 6: REVIEW DATA COLLECTION PROCEDURES

Recommendations

Clearly specify the data to be collected. Include a description of the data collection process, automated or manual. If automated, the degree of data completeness should be estimated. Provide evidence of an internal plan to ensure the collection of valid and reliable data for each indicator. If manual data collection is performed for any indicator, describe how the data collection instrument was designed to promote inter-rater reliability. Describe a prospective data analysis plan for each indicator. Qualifications of staff/personnel used to collect the data should be specified for all indicators.

Step 7: ASSESS IMPROVEMENT S	TRATEGI	ES					
Component/Standard	Y	N	N/A	Comments	Cites and Similar		
					References		
7.1 Were reasonable interventions	\boxtimes			VA PREMIER did not present evidence of a barrier	QAPI RE6Q1a		
undertaken to address causes/barriers				analysis following collection of baseline data in the	QAPI RE6Q1b		
identified through data analysis and QI				second half of calendar year 2004. Rather a barrier	QAPI RE1SQ1-3		
processes undertaken?				analysis was performed following remeasurement 1	QIA \$3.5		
				that is outside of the scope of this review since it	QIA S4.1		
				occurred in 2005. The Interventions Table for 2004	QIA \$4.2		
				did identify the adoption and distribution of clinical	QIA \$4.3		
				practice guidelines to providers in response to an			
				identified barrier resulting from lack of clinical			
				guidelines. Providers were also notified of enrollees			
				on their panel who were being treated with two or			
				more atypical antipsychotics based upon provider			
				lack of information regarding enrollees who were			
				being treated with two or more antipsychotics. These			
				interventions appeared to be reasonable in response			
				to the barriers identified.			
Assessment Component 7							
	resent.						
Partially Met - Some, but not all com	ponents	are prese	nt.				
Unmet -None of the required compor	nents is pi	resent.					
Recommendations							
Ensure that a barrier analysis is completed at	ter each	measuren	nent for a	ıll indicators.			
,							

Step 8: REVIEW DATA ANALYSIS AND INTERPRETATION OF STUDY RESULTS							
Component/Standard	Y	N	N/A	Comments	Cites and Similar		
					References		
8.1 Was an analysis of the findings	\boxtimes			Data analysis was specified as once a year, however,	QAPI RE4Q4		
performed according to the data				each measurement period is six months. Data	QIA III		
analysis plan?				analysis was performed according to the plan, which			
				addressed baseline and remeasurement 1 results			
				separately for each indicator by measurement period			
				(baseline and remeasurement 1) following			
				conclusion of the second measurement period. The			
				qualitative analysis was combined for all indicators			
				and both measurement periods.			
8.2 Did the MCO/PHP present numerical	\boxtimes			The Data/Results Table accurately and clearly			
QIP results and findings accurately and				identified the rate and the comparison goal for each			
clearly?				of the six indicators.			
8.3 Did the analysis identify: initial and			\boxtimes	This is considered a baseline year for submission of	QAPI RE7Q2		
repeat measurements, statistical				this second PIP in compliance with a Department of	QIA S1C4		
significance, factors that influence				Medical Assistance Services contractual	QIA S2.1		
comparability of initial and repeat				requirement. Therefore, only 2004 measurements			
measurements, and factors that				were reviewed.			
threaten internal and external validity?							
8.4 Did the analysis of study data include			\boxtimes	This is considered a baseline year for submission of	QIA \$2.2		
an interpretation of the extent to which				this second PIP in compliance with a Department of			
its QIP was successful and follow-up				Medical Assistance Services contractual			
activities?				requirement. Therefore, no analysis of the extent to			
				which the PIP was successful and follow-up activities			
				was required.			

Step 8:	REVIEW DATA ANALYSIS AND INTERPRETATION OF STUDY RESULTS
Assessr	ment Component 8
\boxtimes	Met – All required components are present.
	Partially Met – Some, but not all components are present.
	Unmet -None of the required components is present.
Recomi	mendations
Conside	er analyzing data after each measurement period.

Step 9: ASSESS WHETHER IMPRO	VEMENT	IS REAL	IMPRO\	/EMENT	
Component/Standard	Y	N	N/A	Comments	Cites and Similar
					References
9.1 Was the same methodology as the			\boxtimes	This is considered a baseline year for submission of	QAPI RE7Q2
baseline measurement used when				this second PIP in compliance with a Department of	QAPI 2SQ1-2
measurement was repeated?				Medical Assistance Services contractual	QIA S1C4
				requirement. Therefore, no repeat measurements	QIA S2.2
				will be reviewed during this cycle.	QIA S3.1
					QIA S3.3
					QIA S3.4
9.2 Was there any documented			\boxtimes	This is considered a baseline year for submission of	QAPI RE7Q3
quantitative improvement in processes				this second PIP in compliance with a Department of	QIA S2.3
or outcomes of care?				Medical Assistance Services contractual	
				requirement. Therefore, documented quantitative	
				improvement in processes or outcomes of care was	
				not reviewed during this cycle.	
9.3 Does the reported improvement in			\boxtimes	This is considered a baseline year for submission of	QIA S3.2
performance have face validity; i.e.,				this second PIP in compliance with a Department of	
does the improvement in performance				Medical Assistance Services contractual	
appear to be the result of the planned				requirement. Therefore, this component will not be	
quality improvement intervention?				reviewed during this cycle.	
9.4 Is there any statistical evidence that			\boxtimes	This is considered a baseline year for submission of	QIA S2.3
any observed performance				this second PIP in compliance with a Department of	
improvement is true improvement?				Medical Assistance Services contractual	
				requirement. Therefore, this component will not be	
				reviewed during this cycle.	

Step 9	ASSESS WHETHER IMPROVEMENT IS REAL IMPROVEMENT						
Assessi	ment Component 9						
\boxtimes	Met - All required components are present.						
	Partially Met – Some, but not all components are present.						
	Unmet -None of the required components is present.						
Recom	Recommendations						

Step 10: ASSESS SUSTAINED IMPROVEMENT							
Component/Standard	Υ	N	N/A	Comments	Cites and Similar		
					References		
10.1 Was sustained improvement			\boxtimes	This is considered a baseline year for submission of	QAPI RE2SQ3		
demonstrated through repeated				this second PIP in compliance with a Department of	QIA II, III		
measurements over comparable time				Medical Assistance Services contractual			
periods?				requirement. Therefore, this component will not be			
				reviewed during this cycle.			
Assessment Component 10							
	resent.						
Partially Met - Some, but not all con	nponents	are prese	nt.				
Unmet -None of the required compo	nents is p	resent.					
Recommendations							

	Key Findings for: Proposal Annual Resubmission Final			
1.	Strengths			
	The study topic submitted does not meet the requirements for a performance improvement project.			
2.	Best Practices			
	None identified.			
3.				
	,			
	Barriers identified included:			
	Lack of clinical guidelines.			
	Lack of identified enrollees prescribed two or more atypical antipsychotics.			
4.	Actions taken by MCO (Barrier Analysis/Response to Clarification Questions)			
	Actions taken by the MCO included:			
	Adoption and distribution of clinical practice guidelines.			
	Identification of enrollees on two or more atypical antipsychotics.			

Key F	ndings for: Proposal Annual Resubmission Final
5. Recon	nmendations for the next submission (Pull from each Step Recommendations)
> >	Improving provider compliance with clinical practice guidelines is not an appropriate study topic for a PIP. A PIP should address system-wide issues, (enrollee, provider, and administrative) that present potential barriers to improved enrollee health outcomes. Describe a clear problem statement based upon analysis of data, which includes the actual or potential health consequences to the
	Medallion II population.
>	Indicators need to be objective, clearly defined measures. Consider limiting the number of indicators and utilizing analysis of findings to drill down to surface additional detail and barriers relating to performance gaps. Cite references in clinical literature supporting association between improvements in selected indicators and changes in health status or valid proxy measures.
>	Clearly define the identified study population to include age and enrollment requirements. Describe how VA PREMIER ensures that the data collection approach validly captures all Medicaid enrollees for each of the indicators.
>	Clearly specify the data to be collected. Include a description of the data collection process, automated or manual. If automated, the degree of data completeness should be estimated. Provide evidence of an internal plan to ensure the collection of valid and reliable data for each indicator. If manual data collection is performed for any indicator, describe how the data collection instrument was designed to promote inter-rater reliability. Describe a prospective data analysis plan for each indicator.
	Qualifications of staff/personnel used to collect the data should be specified for all indicators.
>	Ensure that a barrier analysis is completed after each measurement for all indicators.
~	Consider analyzing data after each measurement period.

Ke	ey Findings for: Proposal Annual Resubmission Final
T	he study design and methodology for this PIP submission meets PIP requirements. The EQRO recommends that the MCO continue with
tł	ne project and report next year on (mo/yr).
T	he study design and methodology for this PIP submission does not meet PIP requirements. To meet requirements, we recommend the
IV	ICO resubmit the following by date to be determined by DMAS and will be communicated to the plans.
•	A study topic that meets the requirement of a performance improvement project and is based upon the analysis of Medallion II data.
•	A clear problem statement based upon data analysis.
•	Objective, clearly defined measurable indicators that measure changes in enrollee health, functional status or satisfaction or serve as
	valid proxy measures.
•	A clear definition of the identified study population and procedures to ensure that the data collection approach captures all eligible
	enrollees.
•	Well-defined data collection and analysis procedures for each study indicator.